



Federal Election Commission
Washington, DC 20463

FEDERAL ELECTION
COMMISSION
SECRETARIAT

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SENSITIVE

MEMORANDUM

November 28, 2006

TO: The Commission

THROUGH: Patrina M. Clark *mc*
Staff Director

FROM: Lynn M. Fraser, Acting Director *LF*
Alternative Dispute Resolution Office

SUBJECT: ADR 351 Republican State Committee of Delaware and Thomas J. Shopa,
Treasurer, Recommendation to Assign

On September 27, 2006, the ADR Office received RR 06L-23 to review and determine its appropriateness for ADR processing. Based on that review, we determined that the case is appropriate for ADR, and recommend that it be assigned to the ADR Office. The ADR Recommendation includes an analysis of the case, and a description of the issues that the ADR Office anticipates addressing if the case is assigned to ADR. In addition, the Office of General Counsel reviewed the ADR Recommendation, and concurs in the description of the case. If the Commission approves the Recommendation, this case description will be provided to Respondents as part of ADR Office's notification package sent to Respondents.

ADR Case: ADR 351

Source No. RR 06L-23

Respondents:
Republican State Committee of Delaware
Thomas J. Shopa, Treasurer

Respondents' Rep.:
Thomas J. Shopa

Complainant:
RAD

Committee Name:
Republican State Committee of Delaware

Date Referral Filed: 8/30/06

Committee Type: State Party

Date Forwarded to ADRO: 9/27/06

District #/or State: DE

[Redacted]

Election - Won/Lost: N/A

[Redacted]

Election Cycle: 2004

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Summary of Complaint: RAD referred the Republican State Committee of Delaware and Thomas J. Shopa, Treasurer (“Respondents” or the “Committee”) for failing to disclose all financial activity on their 2004 30 Day Post-General Report. Respondents filed the original 2004 30 Day Post-General Report on December 2, 2004. On May 6, 2005, Respondents filed an Amended 30 Day Post-General Report that disclosed additional disbursements totaling \$79,004.62. RAD sent a RFAI to the Committee on June 1, 2005 regarding the additional disbursements. On April 27, 2006, Respondents filed a second Amended 2004 30 Day Post-General Report disclosing additional disbursements. The aggregate additional disbursements for the two amended reports was \$81,584.05.

Respondents’ Reply: Respondents filed a miscellaneous electronic submission on June 20, 2005 contending that two transactions had not been included as disbursements when the original 30 Day Post-General report was filed. Respondents filed a second miscellaneous electronic submission on May 25, 2006 stating “When these transfer occurred in October of 2004, the Committee’s staff person ... entered these transfers into our accounting software system. The transfers did not, however, flow through to our reporting software, and thus were not included in the Committee’s original 30 Day Post-General FEC report filed in December of 2004. The Committee has subsequently taken several steps to insure that such omissions do not recur, including additional internal reviews prior to filing.”

RECOMMENDATION:

1. **Assign ADR 351/RR 06L-23 to the ADR Office.**

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